UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

VIKRAM P. GROVER d/b/a "IX ADVISORS" a/k/a "IXA,"

v.

Plaintiff,

NET SAVINGS LINK, INC., a

Colorado corporation and formerly organized as a Nevada corporation, WILTON GROUP, LIMITED, as

registered in the Isle of Man, U.K., WILTON UK (GROUP), LIMITED, as registered in England and Wales, U.K., CHINA FOOD AND BEVERAGE CO., a Colorado corporation, and JAMES A. TILTON,

Defendants.

v.

PACIFIC STOCK TRANSFER, NSAVX, INC., a Wyoming corporation, and JOHN DOE CORP., a/k/a NSAVX.COM, a Puerto Rican corporation,

Trustee-Defendants.

Civil Action No. 1:21-CV-05054

REQUEST FOR ORAL ARGUMENT ON AN EMERGENCY BASIS

PLAINTIFF VIKRAM P. GROVER'S EMERGENCY MOTION FOR ATTACHMENT AND ATTACHMENT BY TRUSTEE PROCESS AGAINST THE DEFENDANTS AND DEFENDANT-AGENTS

The Plaintiff, Vikram P. Grover (hereinafter "Mr. Grover"), pursuant to Federal Rule of Civil Procedure 64(b) and the Local Rules of the U.S. District Court for the Northern District of Illinois, respectfully moves this Honorable Court, for an emergency hearing upon a Short Order of Notice and on an emergency basis, for an Order attaching the shares and the assets of the Defendants, Net Savings Link, Inc. (hereinafter "NSAV"), China Food and Beverage Co. (hereinafter "CHIF"), Wilton Group, Limited (hereinafter "Wilton Isle of Man"), Wilton UK Group, Limited (hereinafter "Wilton UK," and collectively, with Wilton Isle of Man, hereinafter as "Wilton Group" or Wilton"), and James A. Tilton (hereinafter "Tilton") (collectively the "Defendants"), together with their officers, directors, representatives, employees, agents and persons, and any and all subsidiaries, affiliates, parents and/or entities acting in concert with them with actual notice of this Court's Orders, including but not limited to Pacific Stock Transfer Co. (hereinafter the "Pacific Stock" or "Pacific") and NSAVx, Inc., a corporation duly organized in the State of Wyoming (hereinafter "NSAVx-Wyoming"), and John Doe Corp a/k/a NSAVx,com, a corporation duly organized in Puerto Rico (hereinafter "NSAVx-PR" and collectively, with Pacific and NSAVx-Wyoming, hereinafter as the "Defendant-Agents"), in the amount of:

- 1) Fifty-Seven Million Eight Hundred Fifty-Three Thousand Seven Hundred Fifty and 00/100 (\$57,853,750.00) U.S. Dollars; and a \$50,000.00 debenture (convertible into 1.25% of NSAV's fully diluted outstanding shares, or Ninety Six Million Eight Hundred Seventy Five Thousand (96,875,000) shares of Series B stock, convertible into freely tradeable shares of NSAV common stock); and
- 2) any and all shares of NSAV and/or CHIF, as held by Pacific and/or any successor transfer agent (collectively hereinafter the "Transfer Agent") including, but not limited to the <u>2,150,697,026</u> NSAV shares as held by Pacific and/or other Enjoined Defendants and/or Transfer Agents.

The Plaintiff requests that the Court issue such Order of attachment (hereinafter the "Attachment Order" or the "Order") in order to preserve the status quo and maintain the

availability of the Defendant's assets and/or shares, public, restricted, treasury and/or otherwise, for satisfaction of an anticipated Judgment in this action. The Plaintiff respectfully submits that, given the likely highly speculative, volatile and potentially fraudulent nature of the "assets of the Defendant," an Order of Attachment on <u>all</u> of NSAV's Total Assets in an amount equaling \$315,808,737.00 be entered against Defendant NSAV in order to ensure satisfaction of the Plaintiff's award.

The Plaintiff also requests that this Court order the Enjoined Defendants to immediately disclose, in writing and under pains and penalties of perjury by Defendant James Tilton and/or any Chief Executive Officer, Chief Financial Officer, and/or any such officer or director of the Defendants and the Defendant-Agents, the location, custodian and amount of any and all assets which may be subject to such Order of Attachment. The Plaintiff files this Attachment Motion together with its Emergency Motion to Compel Issuance and Delivery of the Public Shares of the Defendant NSAV.

The Plaintiff relies upon, and restates and incorporates by reference, a) its Memorandum, submitted herewith; b) the Affidavit of Vikram Grover with **Exhibits** thereto (hereinafter the "Grover Affidavit"); c) the Affidavit of Philip M. Giordano, Esq. with **Exhibits** thereto (hereinafter the "Giordano Affidavit"); d) the Memorandum in Support of the Specific Performance Motion, with **Exhibits** thereto; and e) the Complaint, with **Exhibits** thereto, and filings in this action. The Plaintiff respectfully requests oral argument at a hearing, on an emergency basis, on a Short Order of Notice for remote hearing on June 26, 2024, which is three (3) days after filing of the instant Emergency Motion, or at such opportunity as may be reasonably convenient for the Court.

WHEREFORE, as set forth in the submissions herewith, the Plaintiff, Vikram Grover,

respectfully moves this Honorable Court for an Order attaching the assets, including assets by

trustee process, as set forth herein. The Plaintiff respectfully requests oral argument at a hearing,

on an emergency basis, on a Short Order of Notice for remote hearing on June 26, 2024, which is

three (3) days after filing of the instant Emergency Motion, or at such opportunity as may be

reasonably convenient for the Court.

Respectfully submitted, PLAINTIFF, Vikram Grover,

By his Attorney,

/s/ Philip M. Giordano .

Philip M. Giordano, Esq. (#193530) Giordano & Company, P.C.

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Dated: June 21, 2024

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CERTIFICATE OF SERVICE

I, Philip M. Giordano, do hereby certify that on the 21st day of June, 2024, I caused to be served a true and correct copy of Plaintiff Vikram Grover's Emergency Motion for Attachment by Trustee Process against Defendants and Defendant-Agents, as filed by and through the District Court's electronic filing/ECF system and that such true copy is available for downloading and viewing by all counsel and parties of record.

Dated: June 21, 2024 /s/ Philip M. Giordano
Philip M. Giordano